

# **EXHIBIT "C"**

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[1] know what it is?  
[2] A. It is Vincent Rizzo Construction, yes.  
[3] Q. What is it?  
[4] A. It is actually, it's a Construction  
[5] Company, that doesn't, it doesn't really  
[6] operate as construction. It's just a property  
[7] holder where our office is at.  
[8] Q. What is the relationship, if any, or what  
[9] was the relationship, if any, between Ashland  
[10] Construction Company, Incorporated and Vincent  
[11] Rizzo Construction Company, Incorporated?  
[12] **MR. SMALL:** As of what time?  
[13] **BY MR. CASEY:**  
[14] Q. As of at any time since August 30, 2002  
[15] and including that date, sir?  
[16] **MR. SMALL:** Do you know when Vincent  
[17] Rizzo Construction Company started to  
[18] exist?  
[19] **THE WITNESS:** Actually Vincent Rizzo  
[20] existed for a period of time, that was  
[21] actually my father's company. It was  
[22] actually a union shop way back when.  
[23] But the actual company now, the company  
[24] never operated in the construction

[1] Q. I understand I think. Did Ashland  
[2] Construction Company, Incorporated have any of  
[3] its employees on the premises of the 3220  
[4] Coachman Road address on August 30, 2002?  
[5] A. Yes, it was myself and a laborer, a  
[6] helper, which was Salvador Ortiz.  
[7] Q. Were there any other persons affiliated  
[8] with Ashland Construction Company, Incorporated  
[9] on the premises of 3220 Coachman Road on August  
[10] 30, 2002 besides yourself and Mr. Ortiz?  
[11] A. No, sir.  
[12] Q. Where does Salvador Ortiz live?  
[13] A. Mexico. As far as an address in Mexico,  
[14] I have no clue what it is.  
[15] Q. When did he return to Mexico?  
[16] A. I would say over a year and a half ago.  
[17] Q. Was he in this country legally as of  
[18] August 30, 2002?  
[19] **MR. SMALL:** Objection, this is for  
[20] jurisdiction for Ashland Construction,  
[21] Vincent Rizzo Construction, Joseph  
[22] Rizzo. He is not party. This is beyond  
[23] Judge Brody's order. I'm going to  
[24] instruct him not to answer.

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[1] field. It just held the property where  
[2] our office was.  
[3] **BY MR. CASEY:**  
[4] Q. As of August 30, 2002, on that date, did  
[5] Vincent Rizzo Construction Company,  
[6] Incorporated exist?  
[7] A. As of that date, the actual, the company  
[8] was to hold, held the property. Yes, there was  
[9] a Vincent Rizzo Construction Company.  
[10] Q. On that date, August 30, 2002?  
[11] A. Correct.  
[12] Q. Were any persons affiliated with Vincent  
[13] Rizzo Construction Company, Incorporated on the  
[14] premises at 3220 Coachman Road in Wilmington on  
[15] August 30, 2002?  
[16] A. No, sir.  
[17] Q. What was your affiliation with Vincent  
[18] Rizzo Construction Company, Incorporated as of  
[19] August 30, 2002?  
[20] A. It was just a property holder, the  
[21] company never operated as construction, it just  
[22] held property.  
[23] Q. Did the company have any employees?  
[24] A. No, sir.

[1] **MR. CASEY:** Mike, the reason I'm  
[2] asking, at this juncture, is it does  
[3] relate to venue and jurisdiction. At  
[4] least it's reasonably calculated to.  
[5] What I'm interested in knowing is where  
[6] he came across Mr. Ortiz and if he is in  
[7] this country, was in this country  
[8] legally, I could obtain additional  
[9] documentation to that effect.

[10] I want to learn whether, for  
[11] example, Mr. Rizzo recruited Mr. Ortiz  
[12] from Pennsylvania or Philadelphia,  
[13] that's why I'm asking the question.

[14] **MR. SMALL:** You can ask that  
[15] question, that's a totally different  
[16] question than what you asked.

[17] **MR. CASEY:** If he is in the country  
[18] legally then there would be  
[19] documentation to that effect and I can  
[20] find out where the man hales from. That  
[21] is the reason I'm asking.

[22] **BY MR. CASEY:**

[23] Q. What is your understanding, sir, of Mr.  
[24] Ortiz' citizenship status as of the time that